

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA

IN RE: : CHAPTER 13
GEORGE HENRY SIMEONE :
fdba George Simeone's 100 Hour Mega : CASE NO. 1:17-bk-04682
Sale :
Debtor :
: :
SPECIALIZED LOAN SERVICING, LLC :
AS SERVICER FOR THE BANK OF NEW :
YORK MELLON F/K/A THE BANK OF :
NEW YORK AS TRUSTEE FOR THE :
CERTIFICATEHOLDERS OF THE :
CWABS, INC. ASSET-BACKED :
CERTIFICATES, SERIES 2006-18 :
Movant :
: :
GEORGE HENRY SIMEONE :
fdba George Simeone's 100 Hour Mega :
Sale :
Respondent :
:

ANSWER TO MOTION FOR RELIEF FROM STAY

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted in part; however, denied to the extent that the Debtor is without sufficient information, such as a pay off statement, to form an opinion as to the exact payoff.
7. Admitted.
8. The Debtor is without sufficient information, such as a pay off statement, to form an opinion as to the exact payoff and therefore this is denied.
9. Admitted.
10. The Debtor is reviewing his records but does not believe that he is that far behind. He will

provide proof of any payments not credited and anticipates curing the remaining arrears either through an amended plan or stipulation.

11. Admitted.
12. Denied. See response to paragraph 10.
13. Denied. See response to paragraph 10.
14. The Debtor lacks knowledge or information sufficient to form a belief as to the truth of this averment, and therefore denies the same.

WHEREFORE, the Debtor respectfully requests that this Court deny the motion for relief filed by the Movant and grant such other relief as this Court deems just.

Respectfully submitted,

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